

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

Case No. 16-03432-MH3-13

KENNETH EARLE JOHNSON
P O BOX 210802
NASHVILLE, TN 37221

October 10, 2017

SSN XXX-XX-3730

TRUSTEE'S OBJECTION TO APPLICATION TO SUSPEND PAYMENTS

THE DEADLINE FOR FILING A TIMELY RESPONSE IS 10/28/2017.

**IF A RESPONSE IS TIMELY FILED THE HEARING DATE WILL BE 11/8/2017 AT 8:30 AM CUSTOMS
HOUSE, COURTROOM 1, 701 BROADWAY, 2ND FL, NASHVILLE, TN , 37203.**

Henry E Hildebrand, III, Standing Trustee for Chapter 13 cases in the Middle District of Tennessee, respectfully objects to the debtor(s) application to modify the plan by suspending or abating payments to the Trustee. The Trustee submits that the request to suspend payments demonstrates that the plan is not feasible and that the plan cannot be funded. The proposed modification fails to propose a reasonable and feasible means to cure the default that will arise as a result of the nonpayment of creditors. The Trustee requests a hearing on the application and requests the Court deny the debtor(s) application.

/s/ Henry E. Hildebrand, III
HENRY E. HILDEBRAND, III
CHAPTER 13 TRUSTEE
P O BOX 340019
NASHVILLE, TN 37203
PHONE: 615-244-1101
FAX: 615-242-3241
pleadings@ch13nsh.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by US Postal Service, postage prepaid to:
KENNETH EARLE JOHNSON, P O Box 210802, Nashville, TN 37221;

Email by Electronic Case Noticing to:
Ms Beth R Derrick, Assistant US Trustee
RABIN P NIMMO, Debtor's counsel
on this 10th day of October, 2017.

/s/ Henry E. Hildebrand, III
HENRY E. HILDEBRAND, III
Chapter 13 Trustee